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**UNITED STATES DISTRICT COURT**  
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**NORTHERN DISTRICT OF CALIFORNIA**

11 GILBERTO F. GUILLERMO and ) Case No. 3:14-cv-04212-JSW  
 12 LILLIAN S. CORTES, )  
 13 Plaintiffs, ) **STIPULATION AND [PROPOSED] ORDER**  
 14 vs. ) **TO CONTINUE CASE MANAGEMENT**  
 15 JPMORGAN CHASE BANK, NATIONAL ) **CONFERENCE AND RELATED**  
 16 ASSOCIATION; CALIBER HOME LOANS, ) **DEADLINES**  
 17 INC., California Corporation; )  
 18 and ) Date: January 9, 2015  
 19 DOES 1-25, inclusive, ) Time: 11:00 a.m.  
 20 Defendants. ) Place: Courtroom 5  
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Defendants JPMORGAN CHASE BANK, N.A. (“Chase”) and CALIBER HOME LOANS, INC. (“Caliber”) and Plaintiffs GILBERTO F. GUILLERMO and LILLIAN S. CORTES (“Plaintiffs”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, this Court issued an Order on October 2, 2014 setting a Case Management Conference for January 9, 2015 at 11:00 a.m., and requiring that the Parties submit a joint case management statement no later than January 2, 2015;

WHEREAS, the Parties are required to exchange their initial disclosures on January 2,

1 2015;

2 WHEREAS, this Court's October 2, 2014 Order did not set a deadline to meet and  
 3 confer, or to file an ADR Certification or Stipulation to ADR Process or Notice of Need for ADR  
 4 Phone Conference;

5 WHEREAS, Defendants Chase and Caliber both filed Motions to Dismiss the First  
 6 Amended Complaint, and the hearing on the Motions to Dismiss is set for January 9, 2015 at 9:00  
 7 a.m.;

8 WHEREAS, the Parties wish to continue the case management conference and all  
 9 related deadlines, including any ADR-related deadlines, until after this Court has ruled on the Motions  
 10 to Dismiss. The Parties so stipulate because until those Motions are resolved, it is unclear what  
 11 claims and theories are properly at issue in this case. Accordingly, the Parties submit that the Court's  
 12 and the Parties' resources would be conserved by continuing the foregoing deadlines until the Motions  
 13 to Dismiss have been resolved.

14 **IT IS SO STIPULATED.**

15 DATED: December 11, 2014

/s/ Jessica Woersching

PHILIP A. MCLEOD  
 JESSICA WOERSCHING  
 KEEBAL, YOUNG & LOGAN  
 Attorneys for Defendant  
 JPMORGAN CHASE BANK, N.A.

19 DATED: December 11, 2014

/s/ Daniel D. O'Shea

DANIEL D. O'SHEA  
 PERKINS COIE LLP  
 Attorney for Defendant  
 CALIBER HOME LOANS, INC.

23 DATED: December 11, 2014

/s/ Tiffany R. Norman

TIFFANY R. NORMAN  
 TRN LAW ASSOCIATES  
 Attorney for Plaintiffs  
 GILBERTO F. GUILLERMO and LILLIAN S.  
 CORTES

27 *I, Jessica Woersching, attest that concurrence in the filing of this document has been obtained from  
 each of the signatories. I declare under penalty of perjury under the laws of the United States of  
 America that the foregoing is true and correct.*

1                   **[PROPOSED] ORDER**  
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3                   Pursuant to the stipulation of the Parties and good cause appearing, it is HEREBY ORDERED  
4 as follows:

- 5                   1. The Case Management Conference currently scheduled for January 9, 2015 shall be  
6                   continued to February 27, 2015 at 11:00 a.m..  
7                   2. The Parties shall submit a joint case management statement on or before  
8                   February 20, 2015.  
9                   3. The Parties shall meet and confer regarding initial disclosures, early settlement, ADR  
10                  process selection, and discovery plan on or before January 30, 2015.  
11                  4. The Parties shall exchange their initial disclosures and file an ADR Certification and  
12                  either a Stipulation to ADR Process or Notice of Need for ADR Phone Conference on  
13                  or before January 30, 2015.

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15                  **IT IS SO ORDERED.**

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17                  Date: December 12, 2014

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JEFFREY S. WHITE  
United States District Judge